

KYLE A. EWING, ESQ.
Nevada Bar No. 14051
JERRELL L. BERRIOS, ESQ.
Nevada Bar No. 15504
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
Email: ewingk@gtlaw.com
berriosj@gtlaw.com

NAOMI BEER, ESQ.*
**pro hac vice forthcoming*
GREENBERG TRAURIG, LLP
1144 15TH Street, Suite 3300
Denver, Colorado 80202
Telephone: (303) 572.6549
Email: beern@gtlaw.com

***Counsel for Defendants SUNRISE HOSPITAL
AND MEDICAL CENTER, LLC, and HCA
Healthcare, Inc.***

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

AYNUR KABOTA, on behalf of herself and all
other similarly situated individuals

Plaintiffs,

v.

SUNRISE HOSPITAL AND MEDICAL
CENTER, LLC; HOSPITAL
CORPORATION OF AMERICA, d/b/a HCA
HEALTHCARE, INC.; and DOES 1 through
50, inclusive,

Defendants.

CASE NO. 2:25-cv-00684-MMD-DJA

**DEFENDANTS' UNOPPOSED
MOTION FOR EXTENSION OF
TIME TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COLLECTIVE AND
CLASS ACTION COMPLAINT
(DKT. [001])**

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Defendant Sunrise Hospital and Medical Center, LLC (“Sunrise”) and HCA Healthcare, Inc.¹ (“HCA”) (collectively “Defendants”) through undersigned counsel, submit this unopposed motion for extension of time, up to and including July 14, 2025, within which to answer or otherwise respond to Plaintiff’s Collective and Class Action Complaint and Jury Demand (ECF #1) (“Complaint”).

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 7.1, Defendant’s counsel certifies that she conferred in good faith with Plaintiff’s counsel. Plaintiff does not oppose the relief requested herein.

MOTION

1. Plaintiff filed her Complaint and Jury Demand on April 16, 2025. (ECF No. 1.)

2. On April 22, 2025, Plaintiff served a Notice of Lawsuit and Request for Waiver of Service on Defendants.

3. On May 1, 2025, Defendants executed the Waiver of the Service of Summons, making the current deadline to answer or otherwise respond to the Complaint June 23, 2025. (ECF Nos. 5, 6.)

4. Defendants have conferred with Plaintiff’s counsel a seek a 21-day extension of time from June 23, 2025, to respond to Plaintiff’s Complaint up to and including July 14, 2025. Good cause exists because Defendants and Plaintiff are currently exploring whether early case resolution is available before either side expends significant resources.

5. In addition, Plaintiff is considering amending the current operative Complaint.

6. This motion has not been brought for any improper purpose.

7. Granting this request will not affect any deadlines set in the case, will not prejudice any of the parties, will not unduly delay these proceedings, and is in the interest

¹ HCA Healthcare, Inc. is improperly identified in the complaint as “Hospital Corporation of America d/b/a HCA Healthcare, Inc.” There is no such legal entity. Further, it is improperly identified as a defendant in this action; at all times, Sunrise was the proper employing entity of Plaintiff. HCA Healthcare, Inc. is a holding company which has no employees.

of justice and fairness.

8. This is the first request for an extension of time in this action by Defendants.

9. Pursuant to Local Rule 6.1©, undersigned counsel certifies that they will contemporaneously serve a copy of this stipulation on their respective clients.

CONCLUSION

For these reasons Defendants Sunrise and HCA respectfully request that this court grant defendants an extension of 21-days, up to and including July 14, 2025, within which to answer or otherwise respond to the Complaint. (ECF No. 1.)

Respectfully submitted this 20th day of June 2025.

GREENBERG TRAUIG, LLP

By: /s/ Jerrell Berrios

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NAOMI BEER, ESQ.*

**pro hac vice forthcoming*

1144 15TH Street, Suite 3300

Denver, Colorado 80202

Telephone: (303.572.6549

***Counsel for Defendants SUNRISE
HOSPITAL AND MEDICAL CENTER,
LLC, and HCA Healthcare, Inc.***

ORDER

IT IS SO ORDERED.



DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

DATED: 6/23/2025

CERTIFICATE OF SERVICE

I hereby certify that on **June 20, 2025**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

/s/ Evelyn Escobar-Gaddi

An employee of GREENBERG TRAURIG, LLP